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17 LOS ANGELES WATERKEEPER

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

LOS ANGELES WATERKEEPER, a  
California non-profit association,

Plaintiff,

v.

NALCO COMPANY LLC, a Delaware  
limited liability company,

Defendants.

Case No.: 2:23-cv-05387 JAK (ASx)

**NOTICE OF LODGING OF  
[PROPOSED] CONSENT DECREE;  
REQUEST FOR ENTRY OF  
[PROPOSED] CONSENT DECREE**

1 WHEREAS, on July 7, 2023, LOS ANGELES WATERKEEPER (“Plaintiff”)  
2 and Defendant NALCO COMPANY LLC (“Defendant”) (collectively, “the Parties”)  
3 agreed on a tentative settlement resolving the issues raised in Plaintiffs’ complaint;  
4 and

5 WHEREAS, on July 11, 2023, Plaintiff filed a Notice of Tentative Settlement  
6 and requested the Court not sign the Consent Decree until a mandatory period for  
7 comment by the United States had passed pursuant to United States Code, title 33,  
8 section 1365(c)(3) and Code of Federal Regulations, title 40, section 135.5 (ECF #10);  
9 and

10 WHEREAS, on July 11, 2023, Plaintiff filed a Notice of Commencement of 45-  
11 Day Review Period, which advised the Court that the United States had acknowledged  
12 receipt of the Consent Decree and would notify the Court of any objections to the  
13 Consent Decree, (ECF #10); and

14 WHEREAS, on August 9, 2023, the United States Department of Justice notified  
15 Plaintiff via electronic mail that the United States does not object to the Court’s entry  
16 of the Consent Decree into judgment; as the Agencies have indicated that they have no  
17 objection to entry, the Court may now enter the [Proposed] Consent Decree, which  
18 includes a request that the Court retain jurisdiction to enforce the terms of the  
19 [Proposed] Consent Decree if necessary.

20 WHEREAS, on August 9, 2023, Plaintiff submitted a [Proposed] Consent  
21 Decree to the Court for approval and entry.

22 THEREFORE, Plaintiff hereby requests the Court sign the [Proposed] Consent  
23 Decree, a true and correct copy of which is attached to this Notice of Lodging as  
24 “Exhibit 1,” and enter the Consent Decree as judgment.

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26 DATED: August 9, 2023  
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/s/Anthony M. Barnes  
Anthony M. Barnes  
Aqua Terra Aeris Law Group  
Attorneys for Plaintiff  
LOS ANGELES WATERKEEPER